



**U.S. Department of Justice**

***Michael J. Sullivan***  
*United States Attorney*  
*District of Massachusetts*

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*John Joseph Moakley United States Courthouse*  
*1 Courthouse Way*  
*Suite 9200*  
*Boston, Massachusetts 02210*

June 23, 2005

George F. Gormley, Esq.  
George F. Gormley, P.C.  
655 Summer Street  
Boston, MA 02210

**Re: United States v. Dinikue Brown, a/k/a "Mouse." Cr. No. 05-cr-40024-FDS**

Dear Attorney Gormely:

Pursuant to Rules 116.6(A) of the Local Rules of the United States District Court for the District of Massachusetts, the government declines to make the following disclosure as otherwise required under Local Rule 116.1(A)(1):

The government declines to identify the cooperating witnesses referenced in its automatic discovery letter dated June 23, 2005, by name at this time. Although the government anticipates that it will call these individuals as witnesses at trial, the government declines to reveal their identities at this time since such disclosure may jeopardize the safety and welfare of the witnesses. The government notes, however, that it has disclosed all of the information required to be disclosed about these witnesses under Local Rule 116.2(B)(1) (including the promises, rewards and inducements that these witnesses have received from the government and the fact that these witnesses have criminal records) in its automatic discovery letter.

Very truly yours,  
MICHAEL J. SULLIVAN  
United States Attorney

By: /s/ Lisa M. Asiaf  
LISA M. ASIAF  
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cc: Clerk's Office, U.S. District Court